

April 23, 2025

VIA ECF

Honorable Michael E. Farbiarz  
United States District Judge  
District of New Jersey  
U.S. Post Office & Courthouse  
Newark, New Jersey 07101

**Re: Khalil v. Trump, et al., No. 2:25-cv-1963 (MEF) (MAH)**

Dear Judge Farbiarz:

In response to the Court's text order from today, ECF 208, Petitioner respectfully states the following:

- a. There are no future hearings currently scheduled before the immigration judge in Louisiana and Petitioner cannot predict if or when the immigration judge will schedule any future hearings. In an ordinary case, Petitioner's counsel would expect one or two additional hearings to be scheduled regarding the government's alleged second ground of removability and, subsequently, regarding Petitioner's applications for immigration relief.
- b. Petitioner is unable to hazard a guess as to the timing of the immigration judge's decision on the government's alleged second ground of removability. At the April 11 hearing, the immigration judge granted the government additional time, until today, April 23, to submit any additional evidence in support of its alleged second ground of removability and for Petitioner to submit any evidence related to the second charge and any applications for relief he may be seeking. Immigration Hearing (Apr. 11, 2025), audio at 01:38:20. When the immigration judge acts on that evidence, and whether or when she might order any additional hearings, is within the immigration judge's discretion.

Respectfully submitted,

/s/ Baher Azmy

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